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CANADA

INCORPORATING SERVICE DOGS INTO THE REHABILITATION PROGRAM OF VETERANS AFFAIRS CANADA

Report of the Standing Committee on Veterans Affairs

Emmanuel Dubourg, Chair

**JUNE 2022
44th PARLIAMENT, 1st SESSION**

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NOTICE TO READER

Reports from committees presented to the House of Commons

Presenting a report to the House is the way a committee makes public its findings and recommendations on a particular topic. Substantive reports on a subject-matter study usually contain a synopsis of the testimony heard, the recommendations made by the committee, as well as the reasons for those recommendations.

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has the honour to present its

SIXTH REPORT

Pursuant to its mandate under Standing Order 108(2), the committee has studied service dogs for Veterans and has agreed to report the following:

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LIST OF RECOMMENDATIONS

As a result of their deliberations committees may make recommendations which they include in their reports for the consideration of the House of Commons or the Government. Recommendations related to this study are listed below.

Recommendation 1

That Veterans Affairs Canada increase funding for Canadian research on psychiatric Service Dogs, and partner with international counterparts to coordinate and build on the growing body of research becoming available worldwide. 19

Recommendation 2

That, after national standards have been established, Veterans Affairs Canada consult the U.S. Department of Veterans Affairs on their five-year pilot program to provide canine training to eligible Veterans through the Puppies Assisting Wounded Service members for Veterans Therapy Act or the PAWS for Veterans Therapy Act, and plan to implement a similar pilot in Canada based on the early results and best practices from the U.S. model. 19

Recommendation 3

That Veterans Affairs Canada cover the costs of psychiatric service dogs for Veterans under the following conditions:

- If a set of overarching standards for service dogs is established;**
- If psychiatric service dogs are likely to significantly reduce the intensity of clinical interventions; and**
- If Veterans can periodically demonstrate their ability to take care of an animal in a manner that ensures its well-being. 21**

Recommendation 4

That Veterans Affairs Canada support and promote the creation of national standards for service dogs in Canada by encouraging all service dog providers in Canada to submit their documentation on their standards and training materials to the Human Research Standards Organization, as it has partnered with the Canadian Foundation for Animal-Assisted Support Services in a national initiative to develop national standards of Canada for all types of animal-assisted services. 31

Recommendation 5

That, until national standards have been set for service dogs in Canada, Veterans Affairs Canada (VAC) work with stakeholders to create and regularly revise an extensive list of all current service dog providers and trainers in Canada to ensure that they are regularly informed of the process of developing national standards, and that VAC provide notice of intent to the technical group of the Human Research Standards Organization and the Canadian Foundation for Animal-Assisted Support Services to develop national standards specifically for Veterans’ service dogs..... 32

Recommendation 6

That the Government of Canada encourage the provinces and territories to harmonize current regulations or to develop new regulations to grant tenancy rights, and access rights to transportation and public places by service dogs who demonstrate the ability to perform service dog tasks, not only obedience tasks..... 40



INCORPORATING SERVICE DOGS INTO THE REHABILITATION PROGRAM OF VETERANS AFFAIRS CANADA

PREAMBLE: DEFINITIONS

A key element of the debate surrounding the contribution of service dogs to the quality of life of veterans with mental health problems is the definition of what a service dog is. The term “service dog” is generally used to distinguish it from a simple pet dog. Service dogs contribute to the health and well-being of the person they accompany because they can do things that a pet dog cannot. They are expected to be a kind of "health professional". What makes them professionals is the specialized training they have received. To be called a service dog, an animal must therefore have received training that is superior to the training that pet dogs usually receive.

The professionalism of the service dog must also be recognized by a public authority through some form of certification. Since the dog provides health and welfare services, the constitutional division of legislative powers in Canada places this certification under the jurisdiction of the provinces and, by delegation of the federal authority, the territories. The federal government retains this responsibility only if the services are provided to persons living on Indian reserves or serving in the Canadian Armed Forces. Since the provinces and territories have not, to date, harmonized their definitions, a service dog is whatever each province or territory decides it is. Definitions therefore vary, and a dog that is recognized as a service dog in one province or territory will not necessarily be recognized as such in another.

In order for a dog to be certified as a service dog, there must be evidence that the animal has undergone rigorous training by a provincially or territorially recognized trainer and/or has passed a test to ensure the dog's professionalism. Certification usually grants legal permission to enter places from which animals are normally excluded. To maintain the distinction between service dogs and pet dogs, pet dogs should not be able to pass this test.

Some may consider the criteria in place in a given province or territory to be too lax or too stringent, but in the absence of a harmonized definition, they are the only legitimate reference that remains independent of industry players. Given the above, the definition of service dog used throughout this report will be:



Service dog: a dog whose skills and rigorous training contribute to the health and well-being of the person it is accompanying and have been certified by a provincial or territorial authority.

When applied to the specific context of Veterans with mental health problems, this definition needs to be refined. All dogs contribute in some way to the well-being or happiness of the people they accompany. Service dogs make an additional contribution by being trained to react to certain signs, to be aware of what may trigger certain symptoms, to comfort and calm the person who is experiencing difficulties, etc. Service dogs provide essential emotional support to the well-being of Veterans and contribute to improving their quality of life beyond what a pet dog could do.

Among this group of service dogs for Veterans, a small number have been bred from birth and trained extensively to perform very specific tasks as part of a clinical psychiatric treatment plan developed by the Veteran's treating physician. These hyperspecialized service dogs will be referred to throughout this report as **psychiatric service dogs**. All other service dogs will be referred to as **emotional support dogs** when distinguishing them from psychiatric service dogs.

INTRODUCTION

For some 15 years now, many Veterans' groups and experts in Canada have been asking for service dogs to be fully incorporated into Veterans Affairs Canada's mental health rehabilitation program. According to these groups and experts, scientific research has proven the benefits of service dogs for Veterans, and so many people with service dogs have come forward to support these findings that their veracity cannot be questioned. Numerous studies, some of which will be presented later, suggest that service dogs can considerably alleviate certain symptoms, especially those associated with post-traumatic stress disorder. These studies, however, were conducted with a limited sample of Veterans and used different criteria to differentiate pet dogs, psychiatric service dogs and emotional support dogs, for example. Although the studies supported the hypothesis that dogs have therapeutic value, they did not meet a high enough threshold of scientific evidence for the department to consider using service dogs as proper medical treatment.

While VAC recognizes the benefits that dogs may have for people with mental health problems, it was not able to adequately answer the following questions:

- a) Do emotional support dogs that are well trained and have passed a test granting them access to public buildings and transportation provide the same benefits as psychiatric service dogs that have received specialized, rigorous training so they can perform Veteran-specific tasks?
- b) Do dogs provide similar benefits for all Veterans who have mental health problems, regardless of the severity of their symptoms, or are there Veterans for whom dogs would be contra-indicated?
- c) If we recognize the therapeutic value of service dogs, should we give all of VAC's clients who have service dogs privileges for public building and transportation access akin to those given to people with a disability, or should we limit this access to psychiatric service dogs, without which Veterans would be unable to access these public spaces?

Very few scientific studies were able to provide clear answers to these questions, until the United States Department of Veterans Affairs published a comprehensive study on the topic in 2020.¹ The study clarified the distinctions between the benefits of psychiatric service dogs and those of emotional support dogs. The study clearly proves that service dogs, regardless of whether they provide psychiatric or emotional support, helped to improve the lives of Veterans with mental health problems. In most situations, the study was not able to prove that psychiatric service dogs provide greater benefits than emotional support dogs, except for a category of Veterans with moderate symptoms, and therefore moderate clinical needs. The first part of this report provides an overview of the current state of knowledge regarding the benefits that service dogs can have for Veterans with mental health problems.

Given that provinces and territories have not harmonized the criteria that differentiate psychiatric service dogs from emotional support dogs in terms of how they are trained, it is difficult to tell how an emotional support dog can meet the training requirements of a psychiatric service dog and whether it is qualified to ease Veterans' symptoms. Therefore, it is impossible to determine which of these dogs deserves access privileges to public buildings and transportation when accompanying their owners. A general consensus on these standards would allow everyone involved, including VAC, to clarify

1 Joan T Richerson (ed.) *et al.*, Department of Veterans Affairs, "[A Randomized Trial of Differential Effectiveness of Service Dog Pairing Versus Emotional Support Dog Pairing to Improve Quality of Life for Veterans with PTSD](#)," 5 January 2020.



their respective roles. Without it, dog breeders and trainers have to resort to self-regulation criteria proposed by private certification organizations, in which case it is difficult to strike a balance between the well-being of Veterans and the interests of those organizations' members. Without a recognized standard to refer to for their definition of what a service dog should be, it is difficult for provinces and territories to harmonize their regulations on animal access to buildings and public transport.

Most witnesses who appeared as part of this study agreed that a harmonized standard is needed, but there have been significant differences of opinion dating back many years over what this standard should be, whom it should apply to and which organization would be responsible for applying it. All the discussions that took place over the past few years on how dogs can help Veterans with mental health problems focused on creating a standard. The second part of this report examines the arguments presented by witnesses regarding actions that the Government of Canada should take to facilitate the harmonization of provincial and territorial norms.

Many Veterans can currently access public buildings and transportation with their dogs if the animal has passed a province- or territory-authorized test whose purpose should be to guaranteeing that it is not a danger to the public. If there were a standard with clear criteria to define psychiatric service dogs and emotional support dogs, many Veterans would fear that their dogs would not meet the criteria for service dogs and that the access privileges for their dogs would be revoked. Given the ambiguity in definitions, all pet dogs that pass the access test could easily be categorized as service dogs. However, the criteria that determine whether a dog is a danger to the public are different from those that determine whether a dog has been rigorously trained to perform certain tasks specifically designed to ease symptoms of post-traumatic stress disorder. In other words, the issue of determining access rights for dogs alongside their owners in public buildings and transportation should be considered separately from the issue of how to distinguish a psychiatric service dog from an emotional support dog. The third part of this report attempts to set guidelines to help the Government of Canada to deal with the incompatibilities raised by a number of witnesses in the public access standards introduced by the provincial and territorial governments.

The Committee dedicated four meetings to this study over the course of the 2nd Session of the 43rd Parliament. In this time, 16 witnesses appeared, and a total of nine organizations and individuals submitted briefs. The Committee members thanks each of them sincerely for their contribution in resolving this issue.

STATE OF KNOWLEDGE ON SERVICE DOGS AND THE MENTAL HEALTH OF VETERANS

Dogs can undeniably help to improve the quality of life of Veterans with mental health problems, as they do with other disabilities. As opposed to pet dogs, service dogs are trained for certain specific tasks, meaning that they will act predictably when they notice a situation unfolding or a symptom appearing. These dogs are legally allowed to access places where other animals are not. There are many types of service dogs, for example:

- Guide dogs help people with reduced vision or hearing.
- Mobility service dogs can retrieve objects and move wheelchairs.
- Medical alert dogs recognize the signs of a dangerous health situation, such as a drop in blood sugar in diabetes patients, can go get help and even dial 911.
- Therapy dogs are used when a person comes for treatment. It provides on-site services to several people and is owned by the care provider.
- Finally, emotional support dogs and psychiatric service dogs can perform various tasks for which they have been trained, including reminding people to take medication, calming someone who is having an anxiety attack and so on.

The difference between the emotional support dog and the psychiatric service dog lies in the complexity of the tasks performed and the level of training required to achieve them. One U.S. study, which will be presented in detail later, identified five standard fundamental tasks that psychiatric service dogs should be able to perform after receiving a verbal command:²

- The dog finds and turns on a light switch in a dark room.
- The dog enters a room and sweeps the perimeter to detect an intruder.
- The dog retrieves an object specified by the Veteran.

2 Joan T Richerson (ed.) *et al.*, Department of Veterans Affairs, "[A Randomized Trial of Differential Effectiveness of Service Dog Pairing Versus Emotional Support Dog Pairing to Improve Quality of Life for Veterans with PTSD](#)," 5 January 2020, p. 30.



- The dog stands in front of the Veteran to provide a barrier between them and an approaching person.
- The dog stands behind the Veteran to provide a barrier between them and a person approaching from behind.

Each dog also has other tasks based on which symptoms Veterans are experiencing.

Emotional support dogs provide therapeutic benefit through companionship and affection. They are not usually trained to perform disability-related tasks and have no access rights to places where animals are denied entry. Some legal accommodations in housing situations exist in the U.S. for people with a disability with an emotional support dog. However, public transportation accommodations are being reviewed in the wake of numerous incidents involving poorly trained animals.³

According to the authors of this recently published U.S. study:

There is some potential confusion between a service dog “task” learned by the dog to reduce handler anxiety and the comfort provided by the presence of an emotional support dog. In an example provided by the Department of Justice, if a dog is trained to sense that an anxiety attack is about to happen and takes a specific action (task) to help avoid the attack or lessen its impact, that would qualify as a service dog. However, if the dog’s mere presence provides comfort, that is not be considered a task and the dog is not considered to be a service dog.⁴

Veterans Affairs Canada (VAC) covers some of the costs associated with caring for guide dogs, up to \$1,500 per year, as medical expenses for Veterans with a visual impairment resulting from their military service. As Crystal Garrett-Baird from VAC said to the Committee, “[o]ther service dogs, such as mental health, hearing and mobility, are not covered.”⁵

Over the past twenty years in Canada and its allied countries, there has been debate on the effectiveness of service dogs for Veterans with mental health problems. A number of

3 [Joan T Richerson \(ed.\) et al., Department of Veterans Affairs, “A Randomized Trial of Differential Effectiveness of Service Dog Pairing Versus Emotional Support Dog Pairing to Improve Quality of Life for Veterans with PTSD,” 5 January 2020, p. 21.](#)

4 [Ibid.](#)

5 [ACVA, Ms. Crystal Garrett-Baird \(Director General, Policy and Research, Department of Veterans Affairs\), Evidence, 12 May 2021, 1650.](#)

limited studies would suggest that service dogs can improve the quality of life of their owners. In 1980, a U.S. study of 92 individuals who had suffered a myocardial infarction opened the debate.⁶ One year after their heart attack, only three of the 53 participants with pets had died, in contrast with 11 of the 39 without pets. Afterward, it was determined that pets, especially dogs, have a therapeutic value and could improve the quality of life of people with all kinds of diseases, including mental illness.

The Committee briefly studied this issue in its [June 2017 report](#) on mental health and recommended “[t]hat Veterans Affairs Canada incorporate international research on service standards and efficacy studies on dog therapy.”

Over the course of that previous study, a number of witnesses, including Philip Upshall, the National Executive Director at the Mood Disorders Society of Canada, had criticized VAC for its delay in adopting a clear policy on service dogs.⁷ These witnesses had said the department was using the lack of large-scale scientific studies as a reason for not taking initiative. In response to this criticism, VAC had said that the problem was not so much the absence of scientific data on the benefits of dogs in general, but rather the difficulty of establishing training standards to discriminate between animals trained for medically recognized therapeutic purposes and animals trained to provide emotional support and comfort.⁸

To establish a stronger scientific foundation, VAC provided funding for a research project with the Canadian Institute for Military and Veteran Health Research (CIMVHR) in 2015. The results were sent to the department in July 2018. The purpose of the project was to assess whether service dogs were an effective and safe way to help Veterans with post-traumatic stress disorder. The project, however, did little to address the issue of a lack of standards.

According to 9 December 2019 [briefing notes from the Deputy Minister of Veterans Affairs](#), the study produced “limited results.” It found that service dogs provided a reduction of post-traumatic stress disorder symptoms, and a moderate long-lasting reduction of depressive symptoms. The study also reported a significant increase in the subjective feeling of well-being related to overall quality of life. However, the results

6 Friedmann, E., Katcher, A.H., Lynch, J.L., & Thomas, S.A. (1980), “Animal Companions and One-year Survival of Patients After Discharge from a Coronary Care Unit,” *Public Health Rep*, 25(4), pp. 307–312.

7 ACVA, Mr. Philip Upshall (National Executive Director, Mood Disorders Society of Canada), *Evidence*, 15 February 2017, 1645.

8 ACVA, [Mr. Michel Doiron \(Assistant Deputy Minister, Service Delivery Branch, Department of Veterans Affairs\)](#), *Evidence*, 8 December 2016, 1615.



indicate that service dogs had no impact on the use of medication or reliance on a family member or caregiver on the part of Veterans with mental health problems.⁹

According to Nathan Svenson from VAC, the variation in the training schools' approaches hindered the study's ability to provide general recommendations, in addition to "variation ... in the placement and the environment in which the dogs are placed. From patient to patient, there's a difference in community dwelling, their social relationships, the other treatments and medications they're taking, their personal interest in activities and also their having another pet."¹⁰ After the study, the Canada Revenue Agency started to recognize service dogs as eligible medical expenses, but this measure's scope proved to be limited as its beneficiaries have to be coping with a severe impairment.¹¹

Colleen Anne Dell, Professor at the University of Saskatchewan's Department of Sociology, discussed two other limited studies that resulted from interviews with 26 and 5 Veterans, respectively:

In a 2016 qualitative study, we saw that [service dogs] assisted with decreasing the problematic use of substances and prescribed medications. They also supported physical health, a sense of psychological acceptance, a social connection and a spiritual purpose, which today we refer to as "moral injury."

In an exploratory study in 2017, we identified a decrease in problematic substance abuse again, decrease in PTSD symptoms and a decrease or stabilization in use of medications that usually have reported negative effects, such as psychiatric medications. In phase one of our pilot study in 2019, we saw a reduction in problematic alcohol and opioid use and PTSD symptoms.¹²

With these results, Professor Dell was able to obtain \$1.4 million in funding for a research project entitled "[Service Dog Research](#)." Health Canada provided \$850,000, the University of Saskatchewan, \$175,000, and AUDEAMUS, a charity that trains dogs for Veterans, \$360,000 in in-kind contributions by allowing researchers to use thirty or so teams of Veterans and dogs for their pilot study to create a toolkit for using service dogs to treat addiction problems in Veterans with PTSD.

9 C. Vincent *et al.*, "Potential Effectiveness of Psychiatric Service Dogs Used by Veterans with Posttraumatic Stress Disorder (PTSD) in Canada," Laval University, 2018.

10 ACVA, [Mr. Nathan Svenson \(Director, Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1710.

11 ACVA, [Ms. Crystal Garrett-Baird \(Director General, Policy and Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1655.

12 ACVA, [Dr. Colleen Anne Dell \(Professor and Centennial Enhancement Chair, One Health and Wellness, University of Saskatchewan, As an Individual\)](#), *Evidence*, 28 May 2021, 1445.

According to Philip Ralph from Wounded Warriors Canada (WWC), a charity that provides service dogs for Veterans, “in 2020, Purdue University in the U.S. found that the task of disrupting episodes of anxiety ranked among the most important and often used tasks among service dogs.”¹³ But until we know what the dog does to achieve this result, or whether it has been deliberately trained to do so, we do not know whether or not the animal can be considered a service dog.

For example, according to Marc Lapointe, one of the founders of AUDEAMUS, who is now the director of Meliora Service Dogs, “[service dogs] wake up their teammate from night terrors, provide comforting pressure—weight—on their partner during a crisis, assist during recovery from fear paralysis or a dissociative state, and prevent or interrupt emotional overload.”¹⁴

Darlene Chalmers, from the University of Regina, described similar results: “I think what that dog is giving to the veteran is the support and opportunity to be able to function in day-to-day life. It might be establishing routines, supporting the veteran, having daily routines set up and being able to get to their appointments, resuming some of the activities that a veteran may have done previously in their life before their injury—and it's mutual.”¹⁵

These statements were corroborated by a number of Veterans, including William Webb, during their appearances before the Committee: “I was on numerous antipsychotic medications. Within the first year ... I was down to one or maybe two. Two years later I was medication-free.”¹⁶ Médric Cousineau went so far as to say that “to date there is no known case of a veteran with a fully trained service dog who has gone on to self-harm. These dogs are a valuable therapeutic adjunct to the war on PTSD.”¹⁷

Such testimonies are numerous and, even without reaching the degree of certainty of a scientific study, they can hardly be considered as anecdotal. They confirm the beneficial virtues of having a dog in general, but until there is a standard defining what a service

13 ACVA, [Captain\(N\) \(Retired\) Philip Ralph \(Director, Health Services, Wounded Warriors Canada\)](#), *Evidence*, 28 May 2021, 1455.

14 ACVA, [Mr. Marc Lapointe \(Certified Trainer, Meliora Service Dogs\)](#), *Evidence*, 14 June 2021, 1620.

15 ACVA, *Evidence*, 28 May 2021, 1510 (Dr. Darlene Chalmers (Associate Professor and Associate Dean of Undergraduate Studies, University of Regina, As an Individual)).

16 ACVA, Mr. William Webb (As an Individual), *Evidence*, 14 June 2021, 1700.

17 ACVA, *Evidence*, 7 June 2021, 1550 (Mr. Médric Cousineau (Co-Founder, Paws Fur Thought)).



dog can do that a pet dog cannot, any description of the benefits of dogs seems only to add to the ambiguity of the problem.

The issue, however, from a research perspective, is whether the benefits of service dogs come from the emotional support they provide to Veterans, or whether a psychiatric service dog is required for these benefits to be felt. When specific programs are analyzed, it is sometimes difficult to determine whether dogs trained or provided by organizations qualify as psychiatric service dogs or emotional support dogs, or if they are just pet dogs that are designated as service dogs for the public access privileges that come with the title.

This makes a recent U.S. study on the benefits of psychiatric service dogs versus emotional support dogs all the more important.¹⁸ This study is currently considered as an essential reference on the topic. However, various witnesses have interpreted it differently.¹⁹ That is why it is necessary to clarify what the authors are clearly establishing and which elements are merely starting points for further research.

Prior to this study, “[t]here [had] been no randomized clinical trials completed that examined the potential benefits of service dogs for Veterans with PTSD.”²⁰ The study indicates that current treatment options for post-traumatic stress disorder lead to relatively low remission rates of between 30% and 40%.²¹ Veterans with PTSD can therefore expect to experience chronic symptoms. That is why it becomes essential to study whether it is possible that service dogs can become a new treatment leading to better quality of life. Since the scientific data on the effectiveness of service dogs was scarce and limited in scope, the U.S. Department of Veterans Affairs took it upon itself to undertake a comprehensive study and sought out 23 authors and 40 team coordinators.

As part of this blind study, 227 Veterans with PTSD were placed in either a group that received a psychiatric service dog (called “service dog” in the study), or a group that

18 Joan T Richerson (ed.) *et al.*, Department of Veterans Affairs, “A Randomized Trial of Differential Effectiveness of Service Dog Pairing Versus Emotional Support Dog Pairing to Improve Quality of Life for Veterans with PTSD,” 5 January 2020.

19 ACVA, [Mr. Nathan Svenson \(Director, Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1735. See also comments made by [Ms. Sheila O’Brien \(Chair, Assistance Dogs International, North America\)](#), *Evidence*, 7 June 2021, 1715; and by [Captain\(N\) \(Retired\) Philip Ralph \(Director, Health Services, Wounded Warriors Canada\)](#), *Evidence*, 28 May 2021, 1455.

20 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 25.

21 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 17.

received an emotional support dog with no prior training in performing tasks specific to PTSD symptoms.

In total, 153 participants completed the study after being paired with a dog over a period of 18 months. The study was designed so that “outcomes would be assessed in terms of impacts on overall mental, social and psychosocial function. Primary consideration was given to the importance of reintegrating Veterans with PTSD into society and effectiveness of a dog in facilitating this process.”²² The study’s primary outcome measures were therefore established by assessing Veterans’ overall well-being and quality of life.

Six secondary outcome measures were added to assess changes in certain aspects of participants’ mental health, including sleep quality, risk of suicide, PTSD symptoms as described in the DSM-V, depression symptoms and anger reactions.

The results of the study are as follows:

Overall, the study clearly revealed that a dog’s mere presence, regardless of what training it had received, helped to significantly improve the mental health of Veterans with PTSD. These findings add to the literature that demonstrates that dogs can:

- reduce stress of living alone, moving frequently, or dealing with social interactions;
- reduce anxiety levels, and improve mood;
- reduce symptoms of depression, fear and aggression;
- reduce pain, increase relaxation and calmness;
- increase trust towards others;
- increase motivation, sense of purpose and self-worth, empathy and learning.²³

As for the difference between psychiatric service dogs and emotional support dogs, “we were unable to reject the null hypothesis for the primary and all but one of the secondary outcomes. This lack of difference between the two interventions for disability

22 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 48.

23 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 19.



and quality [of life] most likely speaks to the overall beneficial effects of companion dog ownership in general.”²⁴

This means that the research team was not able to demonstrate a significant statistical difference between quality-of-life improvements for participants with psychiatric service dogs and participants with emotional support dogs in the primary outcome measures. As for the secondary outcome measures, which will be examined in further detail later, the only difference noted was a statistically significant reduction in PTSD symptoms for the service dog group when compared with the emotional support dog group:

Analysis of the secondary outcome of PTSD symptoms using PCL-5 revealed improvements in PTSD for the [service dog] intervention relative to [emotional support dog] intervention. Furthermore, additional within-group analyses demonstrated improvements in both groups overtime for the primary outcomes with the exception of physical health functioning.²⁵

An in-depth analysis of the results reveals certain important details regarding the study’s various metrics. In the primary outcome measures, two tests were used to measure the degree of disability and quality of life, respectively: the World Health Organization’s (WHO) scale and the Veterans Rand 12 health survey, which is designed specifically for Veterans.

The results of the WHO test revealed a lower degree of disability in participants with a psychiatric service dog than in those with an emotional support dog, but the difference was not significant.²⁶ In addition, the test did not reveal any difference in cognition, mobility, self-care, life activities or participation in society. Both groups reported better interpersonal interactions, with the service dog group having a slight, albeit statistically insignificant, edge in that metric.²⁷

The Veterans Rand 12 test revealed a significant deterioration in both groups’ physical health after the 18-month evaluation period.²⁸ Both the psychiatric service dog and

24 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 99.

25 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 100.

26 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 73.

27 Joan T Richerson (ed.) *et al.*, *op. cit.*, pp. 74 and 104.

28 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 94.

emotional support dog groups saw improvements in their mental health, but no significant difference was found between the two.²⁹

The secondary outcome measures produced the following results:

- Sleep quality improved in both groups, without any significant differences between the two.³⁰
- Risk of suicide dropped in relation to the length of the pairing between Veterans in both groups with their dogs, with the psychiatric service dog group experiencing a steeper decrease that almost meets the threshold of statistical significance. This could indicate a correlation between the length of the pairing period with a service dog and the decrease in suicidal ideation.³¹
- Depression symptoms improved in both groups, without any significant difference between the two.³²
- Both groups showed fewer anger reactions in the first six months of the study. Afterward, anger remained unchanged in the emotional support dog group, but continued to drop in the psychiatric service dog group. However, this decrease was not sharp enough to be considered statistically significant.³³
- PTSD symptoms improved in both groups, but as of month nine of the pairing period, a stronger and statistically significant improvement in PTSD symptoms was noted in the psychiatric service dog group.³⁴ Researchers therefore concluded that regardless of which statistical model was used, “a significant group difference was observed for the PCL-5 (PTSD symptoms) with greater improvement observed

29 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 76.

30 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 79.

31 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 82.

32 Joan T Richerson (ed.) *et al.*, *op. cit.*, pp. 87–88.

33 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 90.

34 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 85.



among participants paired with a [service dog] versus an [emotional support dog].”³⁵

The study’s overall conclusion was that:

Though there were no significant differences between the [service dog] and [emotional support dog] interventions on the primary outcomes or multiple other secondary outcomes, this research did demonstrate within-group improvements for both interventions and between group benefits for the [service dog] intervention for PTSD symptom burden. This reduction in PTSD symptoms for participants who received the [service dog] intervention placed mean scores very close to the cutoff point for less need for clinical intervention, suggesting a [service dog] intervention advantage over an [emotional support dog] intervention.³⁶

Based on that study, one could state that both psychiatric service dogs and emotional support dogs help to significantly improve the quality of life and mental health of Veterans with PTSD but are somewhat of a risk for their physical health. Veterans with psychiatric service dogs reported greater improvement in the severity of their PTSD symptoms than those with emotional support dogs. This observation could be valuable from a clinical perspective, because the psychiatric service dog group scored a 31.66 on the PCL-5 test, which was close to the threshold of 31 that is used to determine whether clinical intervention is required. In other words, it is reasonable to believe that the PTSD symptoms of some participants who used a psychiatric service dog had improved to the point that they would no longer require ongoing clinical intervention.³⁷

This finding is consistent with what Mr. Svenson, from VAC, said about the U.S. study:

What they found was that emotional support dogs showed similar impacts when compared to service dogs when measuring sleep quality, depression levels and mental aspects of the quality of life. However, they found specifically that psychiatric service dogs had a much greater impact in terms of improvement in PTSD symptoms and anger reaction, and to some extent in suicidality, compared to those with emotional support dogs.³⁸

35 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 92.

36 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 110.

37 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 102.

38 ACVA, [Mr. Nathan Svenson \(Director, Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1735.

The U.S. study confirmed that emotional support dogs significantly improved the quality of life of Veterans with PTSD. However, it was not able to prove that psychiatric service dogs made a significant statistical difference in this regard, except for reducing the severity of PTSD symptoms.

These findings appear to reveal a challenging paradox in terms of any potential policy that could be made as a result of them. PTSD symptoms improve more in Veterans with psychiatric service dogs than in Veterans with emotional support dogs, but this improvement has not created any difference in overall quality of life, except for Veterans with moderate symptoms, meaning those who scored approximately 30 on the PCL-5 test, according to the authors. Psychiatric service dogs could help them reduce the number of clinical interventions they require, which would certainly result in a significant improvement in their quality of life.

Therefore, science supports the benefits of emotional support dogs in general for the wellbeing of Veterans who can take good care of animals, without the necessity of having highly trained psychiatric service dogs to fulfill that purpose. In other words, to provide benefits, dogs don't have to meet the threshold of what a medical treatment would be. This puts VAC in an ambiguous position because it can only add dogs to a Veteran's rehabilitation program if they meet that clinical threshold. The department does of course recognize the mental health benefits of service dogs:

[They] are extensively trained to respond precisely to specific disabilities of their owners, including individuals with mental health diagnoses such as post-traumatic stress disorder. Service dogs are trained to detect and intervene when their handler is anxious, contribute to a feeling of safety for their handler, and promote a sense of relaxation and socialization.³⁹

However, according to Dr. Alexandra Heber from VAC, these benefits are not enough to "have the evidence behind it to call this a treatment or a therapy,"⁴⁰ which would allow it to be recognized as an authorized expense within VAC's rehabilitation program. The solution to this dilemma could be the one adopted by the Department of National Defence (DND). DND adopted a [Directive on Service Dogs](#), which includes accommodation measures for Canadian Armed Forces members with mental health problems who wish to be accompanied by their animal in National Defence buildings. The directive states that "the use of service dogs is not a form of medical treatment, but

39 ACVA, [Ms. Crystal Garrett-Baird \(Director General, Policy and Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1650.

40 ACVA, [Dr. Alexandra Heber \(Chief of Psychiatry, Health Professionals Division, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1715.



it is recognized that a service dog may be beneficial to a person with a disability if used at the appropriate time under a treatment plan determined by a medical practitioner.” A compromise of that nature could be worked out at VAC for the public access of dogs of Veterans who are participating in a rehabilitation plan. This question is examined further in this report.

Further research is underway in other countries. According to Ms. Garrett-Baird, Australia has been conducting a study since 2009 and should have results by 2023. While waiting for standards to be applied consistently with the definitive results of this study, Australia has nevertheless decided to change its policy and include psychiatric service dogs in its rehabilitation program under certain conditions, including the requirement to receive psychiatric or psychological treatment for three months.⁴¹ The program is, however, temporary.

Until recently, American Veterans were only eligible for a “veterinary health benefit,” which is limited to issues relating to hearing, vision and mobility. It would therefore not apply to mental health problems.⁴² According to Sheila O’Brien:

The U.S. does not pay for any type of service or guide dog. However, the Veterans administration—if you are a veteran who was honourably discharged—does provide veterinary health benefits for the dog, if it’s an ADI or IGDF accredited dog ... the government does not pay for the dog.⁴³

This could change, however, in a few years from now because on 25 August 2021, the U.S. President signed the [*Puppies Assisting Wounded Servicemembers for Veterans Therapy Act \(PAWS for Veterans Therapy Act\)*](#), which requires the U.S. Veterans Administration to implement a five-year pilot program to provide “canine training” to eligible Veterans as a complement to their health program. To be eligible, Veterans must have received a PTSD diagnosis, been enrolled in Veterans Affairs’ mental health care system and been recommended for participation by a qualified mental health care provider or clinical team. Training would be provided by “accredited nongovernmental entities” that the Administration will seek to sign agreements with. The Act sets out that eligible Veterans will help to train their dog and will be allowed to adopt it if the health care provider deems that it is the best interest of those Veterans to do so. The

41 ACVA, [Mr. Nathan Svenson \(Director, Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1755.

42 ACVA, [Ms. Crystal Garrett-Baird \(Director General, Policy and Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1655.

43 ACVA, [Ms. Sheila O’Brien \(Chair, Assistance Dogs International, North America\)](#), *Evidence*, 7 June 2021, 1655.

Administration must specifically document how the program unfolds and how each participant's medical condition improves, and the Government Accountability Office must submit a report to Congress by the end of the pilot project. The [*Congressional Budget Office*](#) estimated that the program would cost 30 million USD over five years. Approximately 150 Veterans per year are expected to participate in it. Research must therefore continue to be supported. The Committee therefore recommends:

Recommendation 1

That Veterans Affairs Canada increase funding for Canadian research on psychiatric Service Dogs, and partner with international counterparts to coordinate and build on the growing body of research becoming available worldwide.

Recommendation 2

That, after national standards have been established, Veterans Affairs Canada consult the U.S. Department of Veterans Affairs on their five-year pilot program to provide canine training to eligible Veterans through the Puppies Assisting Wounded Service members for Veterans Therapy Act or the PAWS for Veterans Therapy Act, and plan to implement a similar pilot in Canada based on the early results and best practices from the U.S. model.

Looking over the most recently published studies, government departments are cautiously starting to develop programs that would expand the state of knowledge on the benefits of service dogs. It is important to note, however, that the current programs in both the U.S. and Australia are pilot projects.

The scientific data justify a program for psychiatric service dogs for Veterans whose clinical intervention needs would decrease or cease to exist as a result of having those service dogs. Once those Veterans have been identified, it is then necessary to determine who among them would be able to provide these animals with the daily care and ongoing training that the dogs need.

These two criteria are, according to Philipp Ralph of Wounded Warriors Canada (WWC), the most important in determining which veterans would benefit most from a service dog. The harmonization of provincial and territorial standards would help clarify them. Mr. Ralph, like many others, spoke out against the lack of a nationally recognized standard:

[I]t adds undue confusion for a veteran who is already struggling with mental health issues. They are out there and shouldn't have to do their own shopping, shall we say, to try to figure out which program is going to meet their needs.



There needs to be some kind of objective standard so that, when a veteran is in need and their clinician has identified that a service dog would be helpful for them, they can go to a trusted source. That source would be connected to standards. There is no other way to line it up on a national basis.⁴⁴

The website of WWC includes [Prescriber Guidelines](#), which warn health care professionals about the temptation to prescribe a service dog when a veteran's needs do not meet the criteria or requirements set out by the legislation. The guidelines document outlines two criteria:

- a) Veterans must be diagnosed with a disability as determined by their provincial or territorial jurisdiction of residence; and
- b) The symptoms of that disability must be specifically mitigated through the trained behaviors of a service dog, and not just by its mere presence.

The second criterion is decisive because it distinguishes the comfort that a pet dog provides from the “work” that a dog must perform in order to be considered a “service dog.”

WWC's document details situations where service dogs would be contra-indicated. For example, as Dr. Heber, from VAC, said, mental health problems in some Veterans can limit their ability to provide their animals with the appropriate care.⁴⁵ In addition, the U.S. study used rigorous criteria to select the Veterans who would participate in it.

WWC's document also includes a decision tree that shows the differences between Veterans who could benefit from service dogs and those who could benefit from pet dogs. A second decision tree provides a distinction between situations where Veterans could train their dogs themselves and situations where they would need their dogs to be fully trained through a recognized program. The U.S. study did not consider this distinction, as it only included dogs that were trained by a handful of recognized programs.

Lastly, health care professionals must be actively involved in the process if service dogs are to be recognized as a credible option for treating PTSD symptoms. According to Medric Cousineau:

44 ACVA, [Captain\(N\) \(Retired\) Philip Ralph \(Director, Health Services, Wounded Warriors Canada\)](#), *Evidence*, 28 May 2021, 1515.

45 ACVA, [Dr. Alexandra Heber \(Chief of Psychiatry, Health Professionals Division, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1715.

When an individual reaches out, one of the things that has to happen is the intake and screening process within Paws Fur Thought, which includes getting the prescriptions from the doctors to become involved in this process. Failure to do that literally means that we could be providing to the individual something that is contraindicated by the treating clinician. That's why we really need to be cognizant of the fact that they have to become involved in this.

People in the dog industry all love dogs, and they do an amazing job training them, but they are not medical professionals and they are not qualified mental health professionals. We need access to those.

Think about this. PTSD is acknowledged to be one of the most complex and debilitating mental health injuries that there is because of its comorbidities. Anybody who thinks there is a simple solution to a complex problem like that is dreaming. That's why it's an all-hands-on-deck scenario.⁴⁶

The Committee therefore recommends:

Recommendation 3

That Veterans Affairs Canada cover the costs of psychiatric service dogs for Veterans under the following conditions:

- **If a set of overarching standards for service dogs is established;**
- **If psychiatric service dogs are likely to significantly reduce the intensity of clinical interventions; and**
- **If Veterans can periodically demonstrate their ability to take care of an animal in a manner that ensures its well-being.**

46 ACVA, [Mr. Medric Cousineau \(Co-Founder, Paws Fur Thought\)](#), *Evidence*, 7 June 2021, 1730.



STANDARDS, CERTIFICATIONS, ACCREDITATIONS AND OTHER RULES OF PUBLIC AUTHORITIES

“For Canada’s service dog industry to survive and even thrive, isn’t it time to put aside brand and market share stumbling blocks to focus on what matters most—honouring and supporting Canada’s Veterans and their families?”⁴⁷

[Ms. Joanne Moss](#)

Chief Executive Officer

The Canadian Foundation for Animal-Assisted Support Services

This study extensively analyzes the possibility and importance of harmonizing provincial and territorial norms in order to create one standard for the industry that provides service dogs to Veterans with mental health problems. No such standard exists in Canada, or elsewhere for that matter.⁴⁸ There is also a certain degree of confusion as to the scope of the standard. Some private and community organizations have guidelines, but these only apply to their members. That is why in 2015—the same year VAC provided funding for a study on the effectiveness of service dogs (see paras. 11–13)—VAC signed an agreement with the Canadian General Standards Board (CGSB):

... to establish a set of national standards to provide assurance that the service dogs being provided to Veterans are properly trained and meet standardized behavior requirements. On April 17, 2018, the Canadian General Standards Board notified members of the technical committee that it had withdrawn its intent to produce a National Standard of Canada for Service Dogs, as there was no consensus among the committee members that the standard could be achieved. As a result, the initiative to develop a national standard was discontinued.⁴⁹

According to Ms. Moss, this agreement between the department and the CGSB was signed after two national summits on military service dogs organized by the Canadian

47 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1635.

48 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1755.

49 ACVA, [Policy Briefing Notes for the Deputy Minister of Veterans Affairs](#) dated 9 December 2019. The exact contents of these notes were read aloud on several occasions by [Ms. Crystal Garrett-Baird \(Director General, Policy and Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1700, 1720, 1740.

Foundation for Animal-Assisted Support Services (CFAASS), with the CGSB attending. The CFAASS, founded in 1957, is an umbrella organisation for animal welfare societies and other animal protection organisations, and is responsible for coordinating high-level interventions and enforcing public authority standards by its members. It therefore seemed the obvious choice to organise these national conferences. At the time, a number of participants had asked Ms. Moss to submit a proposal to the CGSB for a feasibility study for establishing the standard.⁵⁰ Afterward, “[i]nternal conversations between Veterans Affairs, the CGSB and others we weren’t aware of were happening behind the scenes, and a decision was made that they were going to proceed with the development of the standard.”⁵¹

Very little is known about why this committee of fifteen or so members decided to discontinue the project to create a standard. The various points raised by witnesses reflect the broad range of interpretations regarding the challenges leading up to this decision, as well as the difficult nature of the task undertaken by the CGSB. During his appearance, Nathan Svenson, from VAC, said:

[B]ased on stakeholder input, the focus of the standard broadened from psychiatric service dogs to all service dogs. That might have made it more difficult to come to an agreement.... The fact that consensus couldn’t be reached came from a number of different partners and stakeholders, particularly in the industry. That revolved around the length of time that was required for training, the age at which dogs started training and the use of shock collars. There was a wide variety of disagreement. That’s really what caused the process to stop.⁵²

Some witnesses, including Medric Cousineau, said that a number of participants deliberately undermined the technical committee’s work:

A self-appointed subversive group took CGSB’s work product to the Standards Council of Canada and succeeded in creating such a toxic environment that the impasse that CGSB was confronted with was an inevitable conclusion. They set out to derail the process and they succeeded.⁵³

50 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1640.

51 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1725.

52 ACVA, [Mr. Nathan Svenson \(Director, Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1700.

53 ACVA, [Mr. Medric Cousineau \(Co-Founder, Paws Fur Thought\)](#), *Evidence*, 7 June 2021, 1620.



According to Danielle Forbes, who co-chaired the CGSB committee, several members were concerned that the way the standard would be implemented by governments would prevent Veterans from obtaining a service dog or keeping theirs:

The policy piece is what scared people. The standard was one thing, but they were afraid of how it was going to be built into legislation and policy, and how that would impact the lives of the users and perhaps infringe on their human rights.

It was not the CGSB's job to develop the policy pieces and the regulatory pieces. There was no direct answer to those questions, which made people even more fearful of the process moving forward.⁵⁴

According to Corporal Lohnes from AUDEAMUS, who, at the time, was the RCMP representative on the CGSB committee, members disagreed about how to develop a training program that would specifically address mental health problems:

[I]n what detail should the training of the dog be? What should be included in the standard? For example, there were parties at the table that thought very strongly that there should be a breeding program attached to the standard. I pointed out to them in one meeting that the RCMP didn't start with a breeding program and then develop a standard. It took us a while to develop a very strong standard that is world-renowned. We've gone through three different breeding programs in the RCMP to the present one, where we're very successful.⁵⁵

Another contentious issue was whether the standard should be open or closed. For example, MIRA is an organization with a closed standard that only it can apply. Some stakeholders who participated in the CGSB committee process favoured a closed standard, while others, such as AUDEAMUS, preferred an open standard so that all interested organizations could adopt it without running the risk of creating a certification monopoly.⁵⁶

Lastly, there have been disagreements about how important it is for dogs to be able to obey commands. According to Mr. Lohnes, a dog's ability to obey a command is necessary, but not sufficient for certification. "Are you certifying an obedient dog or are you certifying a mental health support dog?"⁵⁷ According to him, obedience cannot be the main criterion for evaluating a dog's competency. To support Veterans with problems

54 ACVA, [Ms. Danielle Forbes \(Executive Director, National Service Dogs\)](#), *Evidence*, 7 June 2021, 1655.

55 ACVA, [Cpl. Christopher Lohnes \(Royal Canadian Mounted Police, Audeamus Service Dog Program\)](#), *Evidence*, 28 May 2021, 1415.

56 ACVA, [BGen \(Ret'd\) Peter Holt \(Audeamus Service Dogs Program\)](#), *Evidence*, 28 May 2021, 1420.

57 ACVA, [Christopher Lohnes \(Royal Canadian Mounted Police, Audeamus Service Dog Program\)](#), *Evidence*, 28 May 2021, 1445.

resulting from operational stress, the therapeutic relationship between a Veteran and their animal must be characterized by mutual affection, support and compatibility. More standardized training methods can be adapted for service dogs that work with people with physical health problems. For mental health problems, on the other hand, a dog's learned behaviours to recognize and react to situations that trigger symptoms in Veterans are not necessarily transposable from one dog to another. As Gen. Holt said, "[t]he dog is part of your soul."⁵⁸

These disagreements illustrate the complexity of the issues to solve, the variety of approaches, points of view and interests, and the compromises that should have been made by all parties in order to come up with standards that could have received general acceptance. Until now, service dog programs in the private and community sectors, whether or not they are certified by or related in any way to governments, have developed in a disorganized fashion. According to Ms. Moss, the idea of a mandatory standard could appear to some as a business opportunity or a new risk in an industry that has always been self-regulated:

[T]he current situation in this environment in the service dog industry is very fragmented, and there's no rhyme or reason. Anybody can hang a shingle on their door. That's why once a standard is actually developed and published by the Standards Council of Canada, there will be an impartial standard that everybody helped to produce, that all of the various stakeholders had an opportunity to produce. Those who don't want to participate don't have to, but where it gets interesting is that if the government says, "My goodness, this is an amazing job. We like what we see here. We're going to reference those standards in our legislation", then it becomes law. If it becomes law, that actually puts pressure on all of the industries involved to look at what kind of certification is going to happen to comply with the standard, because then it's no longer a choice; it's mandatory.⁵⁹

When the CGSB abandoned its mandate to establish a national standard, this created a vacuum where all industry stakeholders returned to their initial, fragmented state. Although there is a greater amount of detailed scientific data to document the benefits of service dogs, VAC seems less capable than before to create the standard because doing so has become seemingly unworkable. For this reason, the solution to be discussed below excludes both the federal government and industry members. The Committee believes that an impartial, objective organization is required to determine a

58 ACVA, [BGen \(Ret'd\) Peter Holt \(Audeamus Service Dogs Program\)](#), *Evidence*, 28 May 2021, 1425.

59 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1750.



Canadian standard that would be harmonized with those developed by provinces and territories.

The CFAASS, chaired by Ms. Moss, continued its work:

Back in 2019–2020, since the previous process had failed, we went to ground zero and conducted a year-long service dog feasibility study. We actually did an industry and marketplace study. That is available on our website and in my briefing as well.⁶⁰

According to Ms. Moss, VAC did not wish to involve itself in the project, instead choosing to support Wounded Warriors Canada’s program, which uses a private standard established by Assistance Dogs International (ADI).

In 2019, according to the [Public Accounts of Canada for 2019](#), Wounded Warriors Canada received \$245,000 through the Veteran and Family Well-Being Fund in order to expand its service dog program to Veterans with post-traumatic stress disorder. According to one of the organization’s [forms](#), the initial cost of a trained service dog is approximately \$25,000. According to Sheila O’Brien, for comparison, the pilot project in the U.S. launched as part of the recently adopted PAWS for *Veterans Therapy Act* indicated the cost for the dog, as well as the team to train it and its owner, would total \$60,000.⁶¹ A few hundred American Veterans will be able to take part in the pilot project free of charge.

WWC also developed standards for trainers and training schools, as well as guidelines for health care professionals who can write prescriptions in accordance with provincial and territorial health systems and insurance plans. These standards were established in compliance with those recommended by Assistance Dogs International, which is a coalition of not-for-profit organizations that train and place service dogs. These standards include:

- A review of providers’ financial situation and ethics, given that providers must commit to working with other providers in Canada and be accredited by Assistance Dogs International or by the International Guide Dog Federation.

60 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1725.

61 ACVA, [Ms. Sheila O’Brien \(Chair, Assistance Dogs International, North America\)](#), *Evidence*, 7 June 2021, 1720.

- Specific tasks that dogs must be able to perform in order to be distinguished from pet dogs.
- These tasks must absolutely include a mental health component for training schools to obtain funding from WWC.
- Dogs must be trained in a way that promotes their well-being.
- Veterans must be present throughout the training process in order to foster the best relationship possible between human and animal.
- Providers must maintain a certain level of service, which is verified at regular review meetings, in order to receive their payments.⁶²

Furthermore, training provided in accordance with these standards must enable dogs and their owners to pass an equivalent to British Columbia's [assessment test](#). According to Mr. Ralph, "[Wounded Warriors Canada's standards are] a great place to start, and [they are] certainly a lot better than what we have right now."⁶³ Veterans who receive support from Wounded Warriors Canada can also obtain a service dog, but the related expenses are not eligible for reimbursement under VAC's rehabilitation program.

According to Mr. Svenson, from VAC, "[Wounded Warriors Canada] are doing their best to actively fill this space right now, while we don't have national standards. In a sense, that will demonstrate the ability of a governance layer to coordinate the services across service dog providers. We would be interested in that."⁶⁴ In other words, the department hopes that various industry stakeholders will be interested in establishing their own standards that could then be extended across Canada. Thanks to its program and its support from VAC, WWC is in a position to play an informal "governance" role while it waits for effective standards to come into effect.

This informal role that WWC has acquired has, however, fuelled dissension among industry members who see it as an unfair advantage. Mr. Webb and Marc Lapointe, one of the founders of AUDEAMUS who now trains dogs for Meliora and Citadel Canine, criticized VAC's decision to withdraw from the process and leave everything up to

62 ACVA, [Captain\(N\) \(Retired\) Philip Ralph \(Director, Health Services, Wounded Warriors Canada\)](#), *Evidence*, 28 May 2021, 1520.

63 Ibid.

64 ACVA, [Mr. Nathan Svenson \(Director, Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1725.



WWC.⁶⁵ Both witnesses vouched for the CFAASS’s impartiality in the matter.⁶⁶ The CFAASS, with support from the Human Research Standards Organization (HRSO), which oversees standards for research involving humans, chose to continue its work with the other interested stakeholders:

The standards are one of many tools in a tool kit, if you will. They are part of the bigger picture. They will not fix everything, but what they will do is provide an opportunity down the road so that if any level of government wants to reference standards in their legislation, they won’t reference a brand; they will now reference a national standard of Canada that was developed in a fair and transparent process through basically regulated requirements. The [Standards Council of Canada Act](#) also guards this work and its integrity.⁶⁷

The absence of harmonized standards is currently preventing all organizations that provide mental health service dogs from establishing structured accreditation processes. For example, it is becoming impossible to distinguish organizations that train or provide psychiatric service dogs from those that do the same for emotional support dogs. Susan Brock, from AUDEAMUS, is right to insist that an emotional connection between a veteran and their dog is essential if the animal is to enhance a person’s well-being.⁶⁸ However, as mentioned above, this connection is not enough to designate a dog as a “psychiatric service dog.”

Furthermore, some organizations are able to say that they are “accredited” or that the dogs they provide are “accredited” for the simple reason that the animals comply with provincial public building and transportation access standards, without undergoing any assessment of their therapeutic value. Without a standard to distinguish the breeding and ongoing training conditions of psychiatric service dogs from those of emotional support dogs or well trained pet dogs, organizations and businesses are free to advertise that they provide all types of dogs.

65 J. Brian Archer, Director and President, Citadel Therapy Canine Society, “[Brief submitted to ACVA](#),” 23 June 2021.

66 ACVA, [Mr. William Webb \(As an Individual\)](#), *Evidence*, 14 June 2021, 1705–1710; [Mr. Marc Lapointe \(Certified Trainer, Meliora Service Dogs\)](#), *Evidence*, 14 June 2021, 1655.

67 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1730.

68 Susan Brock, Registered Clinical Psychologist, AUDEAMUS, “[Brief submitted to ACVA](#),” 9 June 2021.

The adoption of a Canadian standard would therefore clarify two important distinctions:

- 1) Mandatory procedures enabling organizations and businesses to use the protected designation of “psychiatric service dog” for the dogs they provide, thereby making a distinction between best recommended practices for training these dogs and those for training emotional support dogs when the purpose is to condition the animal to the unique realities of Veterans with mental health problems.
- 2) The conditions under which the provincial, federal and territorial governments will choose to grant public building and transportation access rights to service dogs.

The following sections will focus on these two elements.

Mandatory Standards for Service Dogs

No single international standard for psychiatric service dogs has been recognized by public authorities. Assistance Dogs International (ADI) has, however, frequently been cited as an organization that provides such standards. ADI offers a peer-to-peer accreditation program for member organizations. It has certainly done much for many organizations because it was able to fill the void of recognized public standards by providing guidelines that have since become industry-wide best practices. According to Sheila O’Brien, the North American branch of ADI, which she chairs, “oversees 106 service dog training programs and guide dog programs.”⁶⁹ Wounded Warriors Canada, for example, applies ADI’s standards in its program. When ADI first started in 1987, it only provided dogs to people with physical injuries. However, when psychiatric disorders became more prevalent among Veterans returning from Iraq and Afghanistan, ADI developed a program to treat injuries resulting from operational stress. The first dog provided under this program was to a veteran in 2006. Ms. O’Brien added that:

They’ve been implemented for three years now. Right now, our international standard committee is looking at those standards to make sure that we were on the right path. We really did a good job with those. They’ve helped our VA, which only provides benefits to those who have ADI or [International Guide Dog Federation (IGDF)] dogs. Our VA in the United States does not want to be the one to determine if a dog is a service dog and if it’s doing its job.

69 ACVA, [Ms. Sheila O’Brien \(Chair, Assistance Dogs International, North America\)](#), *Evidence*, 7 June 2021, 1605.



They also are shared with the airlines in North America and Canada. We've been working on that for a long time, so that they have an understanding of what a well-trained service dog does and what training a veteran has had to receive this dog.⁷⁰ ... Every program in ADI that becomes accredited must adhere to these standards. They're checked every five years.⁷¹

However, as Mr. Svenson, from VAC, said, major rifts broke out within the Technical Committee of the Canadian General Standards Board regarding these standards: "some of the providers felt that the Assistance Dogs International standards were not stringent enough and did not require enough hours of training for the dogs. On the other side, some of the schools that did subscribe to that standard didn't agree with the other providers."⁷²

Joanne Moss, from the CFAASS, wanted to highlight the limitations of accreditations obtained using these standards. According to Ms. Moss, ADI's accreditation is:

an internal process suggesting a degree of self-attestation and, or peer review process that determines an organization's benchmarks or private company standards for brand performance and recognition. In other words, all documents that are referred to as national or international standards are private. Therefore, they are only applicable to those who develop them or their respective member organizations or affiliated service providers, not the entire Service Dog Industry.⁷³

Others brought up the ongoing process in the U.S. and wish to adopt similar standards in order to access the whole North American industry. Mr. Svenson, from VAC, warned Committee members against using American standards because he believes that the U.S. department's resources and number of eligible Veterans enabled it to create an extremely rigorous system that would be difficult to replicate in Canada: "it is not practical for the department to say, "here is how it has to be," if nobody in the country can provide up to that standard."⁷⁴

70 ACVA, [Ms. Sheila O'Brien \(Chair, Assistance Dogs International, North America\)](#), *Evidence*, 7 June 2021, 1615.

71 Ibid.

72 ACVA, [Mr. Nathan Svenson \(Director, Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1740.

73 Joanne Moss, Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services, *Service Dog Brief: Notices of Intent*, 20 May 2021, p. 1.

74 ACVA, [Mr. Nathan Svenson \(Director, Research, Department of Veterans Affairs\)](#), *Evidence*, 12 May 2021, 1740.

Therefore, it is important to strike a balance between the robust requirements of a Canadian standard and providers' ability to implement it and adequately meet the needs of Veterans that could benefit from it.

The CFAASS, whose impartiality is recognized since its creation 65 years ago, said it was ready to present a draft national standard in the near future. As the organization's CEO, Joanne Moss, explained:

That's how the process starts. It starts with a technical committee that will vote and will work very diligently on a draft standard. Later on, it will go to public consultation. We'll get feedback, and it will come back to the technical committee. We'll make revisions as necessary. We'll clean up the draft standards, and then it will go to the Standards Council of Canada for their review. If all is good, the Standards Council will publish that national standard.⁷⁵

... As a committee, we will look at the vocabulary being used throughout this sector, including service dog vocabulary, as well as the definitions and a code of ethics, nationally. We will start drilling down from there.⁷⁶

To ensure that the information gathered for the creation of a standard is comprehensive, the organization charged with establishing it should be made aware of the diversity of standards currently applied by industry players. The Committee therefore recommends:

Recommendation 4

That Veterans Affairs Canada support and promote the creation of national standards for service dogs in Canada by encouraging all service dog providers in Canada to submit their documentation on their standards and training materials to the Human Research Standards Organization, as it has partnered with the Canadian Foundation for Animal-Assisted Support Services in a national initiative to develop national standards of Canada for all types of animal-assisted services.

The standard proposed by the CFAASS⁷⁷ would be comprehensive and apply to all service animals. Service dogs would form a sub-group of this larger group and would be able to provide mental health and other services to Veterans. As presented in the

75 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1720.

76 ACVA, [Ms. Joanne Moss \(Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services\)](#), *Evidence*, 14 June 2021, 1725; see also [Mr. William Webb \(As an Individual\)](#), *Evidence*, 14 June 2021, 1740.

77 Ms. Joanne Moss, Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services, [Service Dog Brief: Notices of Intent](#), 20 May 2021, p. 2.



CFAASS’s brief, this general framework would apply to the whole service animal industry and include four “National Standards of Canada”:

- 1) The “development of a management system for animal-assisted services (AAS)” standard would apply to all management systems, organizations and businesses that provide animal-assisted services.
- 2) The “production and delivery of animal-assisted services” would specify the service delivery requirements for the animals in order to establish specific criteria for each type of service provided by an animal under actual service conditions.
- 3) The “training, handling, and care of animals in service” would apply to training schools and all other organizations that provide or use service animals.
- 4) The “production and delivery of animal-assisted services during publicly declared emergencies” standard would apply to all services provided by animals during emergencies.

VAC declined the CFAASS’s offer to join the technical committee that would be in charge of the study on the standards.⁷⁸

The Human Research Standards Organization has launched a public consultation on the draft national standard [Development of an Animal Assisted Personal Services Management System](#) developed by the CFAASS. The Committee sees this as an opportunity to promote the early adoption of a standard and recommends:

Recommendation 5

That, until national standards have been set for service dogs in Canada, Veterans Affairs Canada (VAC) work with stakeholders to create and regularly revise an extensive list of all current service dog providers and trainers in Canada to ensure that they are regularly informed of the process of developing national standards, and that VAC provide notice of intent to the technical group of the Human Research Standards Organization and the Canadian Foundation for Animal-Assisted Support Services to develop national standards specifically for Veterans’ service dogs.

78 Ms. Joanne Moss, Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services, [Service Dog Brief: Notices of Intent](#), 20 May 2021, p. 4.

Danielle Forbes is the executive director of National Service Dogs, a charitable organization that provides dogs that are specially trained to help Veterans with PTSD, free of charge.⁷⁹ Ms. Forbes made a list of all the components that should be included in a standard for service dogs:

We need to ensure the dogs being deployed to Canadians are specifically trained to minimize the limitations of a person with a disability. We need to ensure that the dogs are healthy, temperamentally and physically fit for service, and safe for their handlers and the community at large. We need to ensure that service dog providers are ethical, safe, responsive and responsible, not only to their clients but to the dogs they are deploying out. We also need to ensure that the public can feel confident that when they see a dog in a service dog jacket or a guide dog harness, that dog will not interfere with them, their property or their business.⁸⁰

Although some witnesses, including William Webb⁸¹, recommended that VAC not be involved at all in the development of the standard, this does not mean that the department would have no role in its application. Marc Lapointe, from Meliora, described specifically what VAC needs to do once this comprehensive standard described by Ms. Moss is applied to mental health service dogs for Veterans, specifically. He believes the following is needed:

[T]he recognition of psychiatric medical service dogs within VAC and across Canada; a national registry of responsible and ethical medical service dog program providers that identifies certified dogs, users, handlers, trainers and training organizations; a common standard for training and certification of medical service dog teams across Canada; a national registry of responsible and ethical dog breeders who have been proven to breed healthy dogs with a calm temperament and appropriately long working lives; funding for the breeding, training and care of psychiatric medical service dogs for injured Veterans; and training for VAC case managers about psychiatric and mobility medical service dogs for Veterans, and the application process, because the case managers don't have any clue about what's going on.⁸²

He added that if such a standard comes into effect, a specific organization will have to be in charge of ensuring compliance with it and helping industry members implement it.

79 ACVA, [Ms. Danielle Forbes \(Executive Director, National Service Dogs\)](#), *Evidence*, 7 June 2021, 1600.

80 ACVA, [Ms. Danielle Forbes \(Executive Director, National Service Dogs\)](#), *Evidence*, 7 June 2021, 1600; see also [Mr. Medric Cousineau \(Co-Founder, Paws Fur Thought\)](#), *Evidence*, 7 June 2021, 1620.

81 ACVA, [Mr. William Webb \(As an Individual\)](#), *Evidence*, 14 June 2021, 1615.

82 ACVA, [Mr. Marc Lapointe \(Certified Trainer, Meliora Service Dogs\)](#), *Evidence*, 14 June 2021, 1625.



The provinces and territories could identify organizations that are able to take on this role.⁸³

Public Access for Emotional Support Dogs

It is important to consider the issue of public access for dogs and the requisite training for psychiatric service dogs separately. It goes without saying that when a Canadian standard exists for service dogs and when they will be able to be incorporated into the rehabilitation programs of Veterans who need them most, service dogs should be able to have access rights to public transportation and buildings.

The problem right now is that without this standard, it is impossible to clearly distinguish psychiatric service dogs that have been specially trained to help Veterans deal with mental health issues from emotional support dogs, whether or not they have been specifically trained to help Veterans. The public authorities that grant these rights do not have any standard criteria to inform their decisions, which would explain the overall confusion around the subject.

Mr. Webb, a Veteran who owns a service dog, clearly described the inconsistencies between dogs that pass an exam to receive public access rights and those that undergo rigorous training to comply with a potential binding standard:

[M]y own sister took her pet and did the test in B.C. in 22 minutes. She has a dog that is not trained, and now she has a service dog certified by the Province of B.C. and can go anywhere with a pet. It's a very small dog, so I'm having issues with my own family with regard to how the act is written and implemented in B.C. Anybody can get a service dog in B.C., anybody. If you have a well-behaved dog, you can pass the test. My dog has a standard, not a test.⁸⁴

According to Carl Fleury, from Meliora:

[A]nyone can order on Amazon, in just five minutes, a service dog identification card that will be valid here in Canada. This situation is an issue right now. It's absurd. Anyone can get a service dog identification card without taking a course. The card costs \$35 and is delivered free of charge to your home.⁸⁵

Dogs that pass the public access exam are designated as “service dogs,” but often—exact figures are hard to come by—they are pet dogs whose owners just happen to be

83 Ibid.

84 ACVA, [Mr. William Webb \(As an Individual\)](#), *Evidence*, 14 June 2021, 1700.

85 ACVA, [Mr. Carl Fleury \(Meliora Service Dogs\)](#), *Evidence*, 14 June 2021, 1735.

Veterans in VAC's rehabilitation program. Would such an approach become generalized, the status of "service dog" and the rights thereby granted would not depend anymore on an animal's specific training, but rather on its owner's condition.

Conversely, service dogs that are part of a therapeutic process developed by health care professionals could be excluded from certain places where they would otherwise be allowed if there were a standard that distinguishes service dogs from pet dogs. For example, according to Darlene Chalmers:

A veteran with a service dog being denied counselling or service at a counselling office is a concern. A veteran being denied housing because of a service dog is a concern. There seems to be no standard experience across the country. There's a need for health care and allied professionals to be educated about the role of service dogs and the benefits in Veterans' lives.⁸⁶

Furthermore, since public authorities are unable to assess the risk posed by certain service animals, they are required to apply criteria that are prepared by private organizations and that do not stem from a well-established standard. As Mr. Webb eloquently said, this creates inconsistencies that are particularly apparent when it comes to public transportation because the criteria are different from one province or territory to another:

You can call me on Monday morning. I will be heading home Sunday from Manitoba with my new service dog, and I guarantee you that when I get on BC Ferries on Monday, I will be denied access to the passenger decks because my service dog is from Courageous Companions and not Assistance Dogs International.⁸⁷

According to Medric Cousineau, a harmonized Canadian standard would also help private carriers to homogenize their criteria: "Every single airline I phone has a different response to what is required for me to fly with my service dog. Even though there are things like accessibility laws and disability acts across this country, it is an unregulated, uncontrolled patchwork with no interprovincial reciprocity."⁸⁸

Without official standards, private carriers and government regulators defer to the closest equivalent, i.e., standards developed by ADI and the International Guide Dog Federation (IGDF). This means that only dogs trained by member organizations of these two coalitions are granted public access rights. Some people, including Mr. Webb,

86 ACVA, [Dr. Darlene Chalmers \(Associate Professor and Associate Dean of Undergraduate Studies, University of Regina, As an Individual\)](#), *Evidence*, 28 May 2021, 1450.

87 ACVA, [Mr. William Webb \(As an Individual\)](#), *Evidence*, 14 June 2021, 1740.

88 ACVA, [Mr. Medric Cousineau \(Co-Founder, Paws Fur Thought\)](#), *Evidence*, 7 June 2021, 1630.



condemn this near total monopoly of ADI and the IGDF.⁸⁹ For example, for a dog in British Columbia to be recognized as a service dog, it must have been trained by a member organization of ADI or the IGDF.⁹⁰ The provinces must use private standards due to the lack of a single, overarching one. There are other standards, but without a formal rigorous process like the one undertaken by the CGSB, it is difficult to establish the criteria to hierarchize one standard over another.

For example, Mr. Webb, in addition to John Dugas from Courageous Companions,⁹¹ spoke highly of the standards developed by Meghan Search and Rescue, a First-Nations-managed organization in Manitoba.⁹² Incidentally, this standard is also among those recognized by the Department of National Defence's [Directive on Service Dogs](#), alongside those of the ADI and the IGDF. This raises the question as to why the Department of National Defence lists Meghan Search and Rescue as a recognized provider, but British Columbia does not. A harmonized standard is the only way to address this apparent inconsistency.

Currently, public access rights are granted if an animal has proven to make a therapeutic contribution, whether presumed or certified, e.g., service dogs for blind people. When it comes to emotional support dogs, the issue is whether or not their contribution to the well-being of Veterans is significant enough to warrant public access rights. If so, it would become important to grant these rights to all dogs whose owners have received mental health diagnoses. This would significantly increase the number of risky situations where regulators would have to backtrack because certain dog owners would be unable to guarantee that people in their surroundings would be safe from their animal, which is precisely what happened in the U.S. The U.S. has made certain legal accommodations for people with emotional support dogs in housing and transportation situations, but "[t]he U.S. Department of Transportation is in an ongoing rulemaking process to potentially discontinue the boarding rights granted to emotional support dogs and other species, due in part to increasing in air incidents of aggression and unsanitary incidents caused by poorly trained emotional support animals."⁹³ Presumably, there are good

89 ACVA, [Mr. William Webb \(As an Individual\)](#), *Evidence*, 14 June 2021, 1610.

90 ACVA, [Mr. William Webb \(As an Individual\)](#), *Evidence*, 14 June 2021, 1615.

91 John Dugas, Chairman, Courageous Companions, Chairman, Canadian Association of Service Dog Trainers, "[Brief submitted to ACVA on 23 June 2021.](#)"

92 Michel M. Bourassa, "[Service Dog Training Standards. MSAR vs ADI. Comparison and Commentary.](#)" Appendix to William Webb's brief.

93 Joan T Richerson (ed.) *et al.*, Department of Veterans Affairs, "A Randomized Trial of Differential Effectiveness of Service Dog Pairing Versus Emotional Support Dog Pairing to Improve Quality of Life for Veterans with PTSD," 5 January 2020, p. 21.

intentions behind expanding public access rights for emotional support dogs, but these do little to guarantee public safety.

Some dog providers would be inconvenienced if the definition of a service dog is clarified. For example, those who rescue and train abandoned dogs would likely have a more difficult time getting their dogs certified to become psychiatric service dogs. According to the authors of the U.S. study, dogs with uncertain histories pose a particular risk, and this risk must be addressed very carefully when it comes to pairing these dogs with people with mental health problems. In a preliminary phase of the study, this distinction was not applied systematically, and two children were bitten by dogs that were later found to be rescue dogs. Those dogs were removed from the study, which limited its scope to dogs specifically raised to become service dogs.⁹⁴

Medric Cousineau gave a similar warning:

There are some programs that are doing the owner-train participatory model. However, you must be aware, and it's highlighted in the prescriber guidelines, of the inherent danger of attempting to take a person with serious mental health issues, pair them with a dog of unknown provenance and get them to the finish line in the service dog world. If they fail, which there is a fairly large possibility of, you have literally reinforced failure for a veteran who is struggling.⁹⁵

This is particularly challenging for providers that raise abandoned dogs. AUDEAMUS, a not-for-profit organization that developed a service dog program for Veterans' operational stress injuries, often uses rescue dogs, which helps to keep costs relatively low. According to the chairman of its board, Brigadier General (Ret'd) Peter Holt, "[AUDEAMUS] can put a dog into a veteran's hands for between \$3,000 and \$5,000,"⁹⁶ compared to \$25,000 for dogs from WWC or \$60,000 for dogs from the U.S. pilot project's providers.

According to Corporal Lohnes, who is a member of the Royal Canadian Mounted Police's Police Dog Service, recipient of the Minister of Veterans Affairs Commendation and co-founder of AUDEAMUS, the program is based on positively reinforcing behaviours that dogs are trained for: "routines and rituals are developed for the injured person that are unique to them, to learn how to do activities with their potential service dog.

94 Joan T Richerson (ed.) *et al.*, Department of Veterans Affairs, "A Randomized Trial of Differential Effectiveness of Service Dog Pairing Versus Emotional Support Dog Pairing to Improve Quality of Life for Veterans with PTSD," 5 January 2020, p. 31.

95 ACVA, [Mr. Medric Cousineau \(Co-Founder, Paws Fur Thought\)](#), *Evidence*, 7 June 2021, 1645.

96 ACVA, [BGen \(Ret'd\) Peter Holt \(Audeamus Service Dogs Program\)](#), *Evidence*, 28 May 2021, 1355.



Routine building fosters the injured brain to make reconnections and to develop improved long-term and short-term memories.”⁹⁷

Over a period of several months, Veterans receive 15 or so lesson modules to help them train their dogs. The main objective is to build a durable trusting relationship between every dog and its owner, not to just train a dog to become a perfectly obedient creature. As Darlene Chambers said, “[s]ervice dogs are not tools. They’re not devices for human welfare, even though they are complements in Veterans’ treatment and supports to them.”⁹⁸ As General Holt said, a dog is an injured veteran’s “battle buddy.” AUDEAMUS certification is not just granted if a dog can obey specific commands; it relies on the ability of a veteran and their dog to pass a more comprehensive assessment of whether they can work together and maintain a genuine relationship.

AUDEAMUS provides a sophisticated program that enables Veterans to train their dogs while considering the needs of both parties, acknowledging that a Veteran’s medical condition could pose additional challenges. Certification upon completion of the program reflects the quality of the relationship between a Veteran and their dog and the dog’s ability to adequately react to triggers in various day-to-day situations.

When we start moving into the full certification, it’s three days long for us. ... During our process, yes, we take them for a walk here and there, in different places. We take them in the environments that they need to function in. If you never go to Costco, I’m not taking you to Costco because you’re never going to go there, but if you’re going to your doctor’s office five days a week, we’re going to do some work there to see how you’re functioning there. How are you in the doctor’s waiting room? How are you in the doctor’s office?

It’s always looking at whether the team is present. If they’re present, they’re safe. If they’re not present or their timing is off, then they can’t see their surroundings so they’re not safe in that environment. That means we have to go back to the drawing board and help them more for that specific environment.”⁹⁹

This kind of program can without a doubt significantly improve the well-being of Veterans with mental health problems. The purpose of the program is to strengthen the deep bond between the animal and its owner. This relationship has been clearly proven to significantly improve the well-being of Veterans with mental health problems. If a

97 ACVA, [Christopher Lohnes \(Royal Canadian Mounted Police, Audeamus Service Dog Program\)](#), *Evidence*, 28 May 2021, 1405.

98 ACVA, [Dr. Darlene Chalmers \(Associate Professor and Associate Dean of Undergraduate Studies, University of Regina, As an Individual\)](#), *Evidence*, 28 May 2021, 1450.

99 ACVA, [Cpl. Christopher Lohnes \(Royal Canadian Mounted Police, Audeamus Service Dog Program\)](#), *Evidence*, 28 May 2021, 1435.

Veteran wants a service dog and shows that they have the right skills to take care of it adequately, this can only be beneficial. However, it does not constitute a therapeutic treatment as per the criteria of VAC's rehabilitation program. As discussed above, only dogs specifically trained to become psychiatric service dogs have proven that they have certain advantages from a clinical perspective for some Veterans over the benefits provided by emotional support dogs to all Veterans.

The question now is whether emotional support dogs provide enough benefits for VAC to cover their expenses as part of its rehabilitation program. As for psychiatric service dogs strictly speaking, the decision is obvious and has already been addressed above.

Approximately 40,000 Veterans, who are all clients of VAC, have received a mental health diagnosis, and close to 25% of these 40,000 are eligible for VAC's rehabilitation program. It would therefore be justifiable for VAC to cover the expenses of emotional support dogs for approximately 10,000 Veterans. Assuming that half of those Veterans will use the program, it would cost a substantial \$25 million to implement (maximum of \$5,000 per AUDEAMUS-trained dog). However, the funding would not be ongoing, except for expenses related to veterinary care, if they were to be included, and for replacing a dog.

If emotional support dogs owned by VAC clients who are enrolled in the department's mental health rehabilitation program are given public access rights, current providers would maintain their access in a major market and could provide well-trained emotional support dogs at a much lower cost than private service dogs in cases where the therapeutic benefits of psychiatric service dogs are negligible when compared to those of emotional support dogs. For example, the Canadian Veteran Service Dog Unit (CVSDU) asked in its brief to establish a standard to ensure that service animals are properly taken care of during their training and to guarantee public safety, in the same way as a driving school assures clients that they will be treated well and that passing the course would allow them to pass their driver's test.¹⁰⁰ However, the CVSDU fears that if the standard is too strict and only recognizes dogs that are trained to perform therapeutic tasks as "service dogs," it could imperil many small-scale organizations that do excellent work in communities.¹⁰¹

According to Laura A. MacKenzie, from K-9 Country Inn Working Service Dogs:

100 Reverend (Maj Ret'd) R.M.A. "Sandy" Scott MSM CD, Secretary to the Board, Canadian Veteran Service Dog Unit (CVSDU), "[Comments on the Evidence received by ACVA](#)," 21 June 2021.

101 Reverend (Maj Ret'd) R.M.A. "Sandy" Scott MSM CD, Secretary to the Board, CVSDU, "[A Presentation to the Standing Committee on Veteran's Affairs on the Canadian Veteran Service Dog Unit](#)," 16 June 2021.



[S]tandards won't stop fake or poorly trained service dogs. More important than having the standards is that they need to be enforced, and they have to be regulated by testing and licensing the team. You could open up and get more dogs available to people if you allowed other trainers within Ontario, within Canada, to be able to utilize their dogs, but there has to be some kind of testing to say that they are following the correct standards and that the outcome—the handlers, the team—are meeting that criteria.¹⁰²

An important distinction must be made between access to public buildings and public transportation. Public safety requirements can be less strict for public buildings and housing units. However, public transportation implies staying put in a closed space for long periods of time, which requires stricter rules. The Department of National Defence already offers accommodations, without however officially recognizing that service dogs are a form of medical treatment. Should this duty to accommodate be extended to rental property and public building owners?

The only reason to refuse dogs access to public areas is that they may pose a threat to the public or to property in those areas. If the obedience test guarantees safety, there is no reason to officially assess whether dogs can mitigate the symptoms of Veterans' operational stress injuries for these dogs to access public areas. VAC could, without however paying for the expenses of emotional support dogs, simply provide documentation that a Veteran is a VAC client with a mental health problem, and that Veteran could then provide evidence that their dog passed the safety test.

Recommendation 6

That the Government of Canada encourage the provinces and territories to harmonize current regulations or to develop new regulations to grant tenancy rights, and access rights to transportation and public places by service dogs who demonstrate the ability to perform service dog tasks, not only obedience tasks.

CONCLUSION

Close to 40,000 of the approximately 120,000 Veterans who are VAC clients received a mental health diagnosis. Of those 40,000, approximately 10,000 have severe enough symptoms to participate in a rehabilitation program that is coordinated by a case manager. Symptom remission rates vary with the current treatment options, but they are between 30% and 40% for people with post-traumatic stress disorder (PTSD).¹⁰³

102 ACVA, [Ms. Laura A. MacKenzie \(Owner and Master Trainer, K-9 Country Inn Working Service Dogs\)](#), *Evidence*, 7 June 2021, 1650.

103 Joan T Richerson (ed.) *et al.*, *op. cit.*, p. 17.

Veterans with PTSD can therefore expect chronic symptoms. That is why it is paramount to consider the possibility that service dogs can be a new treatment to create a better quality of life.

Based on the scientific studies completed to date, it is clear that having a service dog, no matter what training it has received, helps to significantly improve mental health in Veterans with PTSD. However, it is not possible to state that psychiatric service dogs that were trained to perform specific tasks attached to a medical treatment plan provide greater benefits than emotional support dogs that have not received that training.

For now, according to VAC, the evidence does not justify creating a large-scale program to incorporate psychiatric service dogs into the rehabilitation plans of all Veterans who want one.

There is, however, one exception: Veterans with moderate symptoms. A psychiatric service dog could alleviate their symptoms and reduce the number of clinical interventions they require as part of their rehabilitation program. These results were not as clear in Veterans with emotional support dogs. That is why the Committee is recommending that VAC introduce a pilot project that would incorporate psychiatric assistance dogs that have been rigorously trained into its rehabilitation program for Veterans with moderate PTSD symptoms.

Until now, the private and community sectors have developed their programs in an unorganized fashion. Whether or not they were accredited by a private international organization or by public authorities, it is not currently possible to identify programs or businesses that can guarantee that their dogs meet the requirements of a structured program for psychiatric service dogs. That is why it is imperative that the Government of Canada mandate a competent independent authority in the dog training industry to establish an industry-wide standard.

According to the current body of knowledge, most Veterans with mental health problems would benefit from having an emotional support dog if they are able and willing to properly take care of it. It is unreasonable to reject these benefits and say that the animals have not been sufficiently trained for their use to be qualified as a real therapeutic intervention. In other words, could VAC encourage Veterans to obtain emotional support dogs, knowing the benefits they provide?

One solution that the Committee recommends would be to use the public access rights granted to some owners' animals as a starting point. For example, the Department of National Defence's [Directive on Service Dogs](#), while not recognizing them as a medical



treatment, includes accommodations for soldiers with mental health or other problems who would want their dogs with them in buildings managed by the department.

If public access rights can be granted to emotional support dogs whose owners are clients of VAC's mental health rehabilitation program, current private and community providers would preserve their access to a major market and could offer well-trained emotional support dogs at a much lesser cost than psychiatric service dogs in cases where the therapeutic benefits of the latter are negligible when compared to those of the former. For this to work, VAC would have to certify the behavioural requirements of Veterans' dogs, with the provinces and territories then being in charge of sending their applications to competent organizations. This would ensure that public access rights are standardized across Canada.

Over the course of this study, Committee members realized that the issue of service dogs for Veterans is far more complicated than it would first appear. On the one hand, the department cannot ignore the limitations of current scientific data in its intention to foster Veterans' well-being, but, on the other, it has a duty to give Veterans every resource available that fosters their well-being, even if those options do not fit the current criteria for eligible therapeutic treatment.

We sincerely thank all witnesses and organizations that have helped us to clarify these issues. We hope that this report fairly reflects their concerns and provides concrete solutions to help VAC implement all measures that could foster Veterans' well-being.

APPENDIX A LIST OF WITNESSES

The following table lists the witnesses who appeared before the committee at its meetings related to this report. Transcripts of all public meetings related to this report are available on the committee’s [webpage for this study](#).

43rd Parliament—2nd Session

Organizations and Individuals	Date	Meeting
Department of Veterans Affairs Crystal Garrett-Baird, Director General Policy and Research Dr. Alexandra Heber, Chief of Psychiatry Health Professionals Division Nathan Svenson, Director Research	2021/05/12	26
As an individual Darlene Chalmers, Associate Professor and Associate Dean of Undergraduate Studies University of Regina Colleen Anne Dell, Professor and Centennial Enhancement Chair One Health and Wellness, University of Saskatchewan	2021/05/28	27
Audeamus Service Dogs Program BGen (Ret’d) Peter Holt Cpl Christopher Lohnes, Royal Canadian Mounted Police	2021/05/28	27
Wounded Warriors Canada Philip Ralph, Director Health Services	2021/05/28	27
Assistance Dogs International, North America Sheila O'Brien, Chair	2021/06/07	29
K-9 Country Inn Working Service Dogs Laura A. MacKenzie, Owner and Master Trainer	2021/06/07	29

Organizations and Individuals	Date	Meeting
National Service Dogs Danielle Forbes, Executive Director	2021/06/07	29
Paws Fur Thought Medric Cousineau, Co-Founder	2021/06/07	29
As an individual William Webb	2021/06/14	31
Meliora Service Dogs Carl Fleury Marc Lapointe, Certified Trainer	2021/06/14	31
The Canadian Foundation for Animal-Assisted Support Services Joanne Moss, Chief Executive Officer	2021/06/14	31

APPENDIX B LIST OF BRIEFS

The following is an alphabetical list of organizations and individuals who submitted briefs to the committee related to this report. For more information, please consult the committee's [webpage for this study](#).

Audeamus Service Dogs Program

Canadian Veteran Service Dog Unit

Citadel Canine Society

Courageous Companions

Service Dog Research

The Canadian Foundation for Animal-Assisted Support Services

Webb, William

REQUEST FOR GOVERNMENT RESPONSE

Pursuant to Standing Order 109, the committee requests that the government table a comprehensive response to this Report.

A copy of the relevant *Minutes of Proceedings* ([Meetings Nos. 26, 27, 29 and 31](#)) from the 43rd Parliament, 2nd Session and ([Meetings Nos. 11, 12, 16 and 17](#)) from the 44th Parliament, 1st Session is tabled.

Respectfully submitted,

Emmanuel Dubourg
Chair

Bloc Québécois Dissenting Opinion on the Standing Committee on Veterans Affairs' Report on Incorporating Service Dogs into the Rehabilitation Program of Veterans Affairs Canada

The Bloc Québécois would first like to thank each of the witnesses who appeared before the Standing Committee on Veterans Affairs for its study on incorporating service dogs into the rehabilitation program of Veterans Affairs Canada. Service dogs have tremendous potential to improve the quality of life for many Veterans. The Bloc Québécois therefore supports having Veterans Affairs Canada increase funding for research on service dogs for the purpose of facilitating and expanding their use among Veterans in Quebec and Canada.

The Bloc Québécois supports regulating the training of service dogs. However, we are opposed to having the federal government take responsibility for this, as this would not respect jurisdictional boundaries. While services to Veterans is a federal responsibility, the delivery of health care is clearly a provincial responsibility. We believe that the Committee has lost sight of the fact that Canada is a federation and that many of the recommendations simply cannot be unilaterally enforced by the federal government. In order to better support Veterans and the general public, the Bloc Québécois reiterates that the federal government must increase the Canada Health Transfer to the provinces to cover 35% of their health care spending, and then index this amount at 6% per year. In this dissenting opinion, the Bloc Québécois wishes to make a few comments on the recommendations for the sake of realism and out of respect for Quebec's autonomy.

Recommendation 2

Although the Bloc Québécois is in favour of Veterans Affairs Canada consulting the United States on their five-year pilot program to provide canine training to Veterans, we are opposed to this recommendation being conditional on the development of national standards.

Recommendation 3

The Bloc Québécois is very much in favour of Veterans Affairs Canada covering the costs of psychiatric service dogs for Veterans under the listed conditions. However, we are against establishing a set of overarching standards for service dogs and instead call on the federal government to rely on provincial standards. We believe it is imperative that the federal government work with Quebec and the provinces so that they can adopt the standards they deem appropriate, based on the information and findings presented by the Committee.

Recommendation 4

The Bloc Québécois rejects the premise of this recommendation, which suggests that the federal government should impose national standards. We reiterate our call for Veterans Affairs Canada to recognize provincial standards, or if the absence of such standards, to direct the provinces to develop them, while not interfering in their jurisdiction.

Recommendation 5

The Bloc Québécois opposes this recommendation, since once again it seeks to impose standards on the provinces rather than respect jurisdictional boundaries.

The Bloc Québécois believes that the report fails to mention provincial jurisdictions and that this condemns it to be, in theory as well as in practice, inoperative. At the very least, the Bloc Québécois would have found it more appropriate had the Committee recommended that Veterans Affairs Canada consult with the provinces on establishing such standards instead of imposing them. For example, Quebec could choose to work with Veterans Affairs Canada on developing training standards applicable only to Quebec, just as it could choose to approach the Council of the Federation with the idea of harmonizing the rules for accessing places, buildings and public transportation for service dog owners. Clearly, the Bloc Québécois believes that the initiative to develop national standards or harmonize them with other provinces is a provincial responsibility, not a federal one.

Apart from our objection to national training standards being imposed on the provinces by Veterans Affairs Canada, the Bloc Québécois supports the rest of the Committee's recommendations. Service dogs hold great potential for improving the quality of life for Veterans suffering from psychological disorders developed during their military service. There are many aspects of this report that support this potential, without encroaching on the jurisdictions of Quebec and the provinces.

In closing, the Bloc Québécois wishes to add a new recommendation to the report to better support Veterans and the general public with respect to health care.

New recommendation from the Bloc Québécois

That the federal government immediately increase the Canada Health Transfer to the provinces to cover at least 35% of their health care spending and index it at 6% per year in order to improve and maintain the quality of health care provided to the public, including Veterans.

Supplementary Report of the New Democratic Party (NDP)

The Committee of Veterans Affairs (ACVA) studied the issue of Service Dogs for Veterans in May and June 2021 as part of the 43rd Parliament. Unfortunately, the study did not result in a report because of the subsequent dissolution of Parliament and the resulting election campaign. New Democrats were pleased to support the return of the study to ACVA in the 44th Parliament because, in general, we believe that the health and well-being of Veterans is improved with the aid of service dogs, and that Veterans Affairs Canada (VAC) has a role to play in supporting the dog-related costs for the Veterans.

The key issue is the establishment of national standards for animal-assisted support services, which has proven difficult to produce within a fragmented, unregulated, multi-million-dollar sector. Without national standards there are no protocols in place to ensure safety and quality of the dogs, the safety of the public, the safety of the Veteran, and there is no process for accreditation of service dog organizations.

The Committee learned that national standards in Canada can only be created through the Standards Council of Canada,¹ and that the process is currently underway through a partnership between the Canadian Foundation for Animal Assisted Support Service, an impartial, non-profit organization, and the Human Research Standards Organization, an accredited standards development organization.

Joanne Moss, Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services, testified:

“The standards are one of many tools in a tool kit, if you will. They are part of the bigger picture. They will not fix everything, but what they will do is provide an opportunity down the road so that if any level of government wants to reference standards in their legislation, they won't reference a brand; they will now reference a national standard of Canada that was developed in a fair and transparent process through basically regulated requirements.”²

The Committee heard testimony from various witnesses that underscored the benefits of service dogs for Veterans. The question of efficacy of treatment is not an issue of concern for the NDP. New Democrats believe that service dogs can play a significant role in improving the physical and mental health and well-being of Veterans. Full stop. We do not believe more money needs to be spent on research in this field when there are far more urgent areas of study which VAC should support, such as research into the physical and mental supports of women in the military.

¹ <https://www.scc.ca/en/agl-nsc>

² House of Commons, Standing Committee on Veterans Affairs (ACVA), Evidence, 14 June 2021, Joanne Moss

New Democrats want VAC to act immediately on the recommendations contained within the Committee report. The need for national standards is critical, and VAC should do everything in its power to support the process without interfering in their development. In this way, the department will live up to its mandate to help Veterans access the supports and services they need, and to listen to the suggestions of Veterans, to strive to design and deliver programs that meet the modern and changing needs of Veterans and their families.³

³ <https://www.veterans.gc.ca/eng/about-vac/what-we-do/mandate>